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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No. 3-15-71060 MAG
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	CONTINUING PRELIMINARY
v.)	HEARING/ARRAIGNMENT
)	
JING ZENG,)	
)	
Defendant.)	

STIPULATION

1. The above-referenced case is scheduled for preliminary hearing or arraignment on February 18, 2016. The parties request a continuance to March 9, 2016.

2. Counsel for the parties require additional time to evaluate evidence - including computer forensics, information located by the government in various searches, and a transcript of a consensually monitored meeting - and to discuss it with each other prior to preliminary hearing or indictment. The defendant does not object to a continuance.

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STIPULATION AND ORDER
NO: 3-15-71060 MAG

3. Time under Fed. R. Crim. P. 5.1 and the Speedy Trial Act should be excluded from February 16, 2016 to March 2, 2016, pursuant to 18 U.S.C. § 3161(h)(7). The parties agree that this exclusion is appropriate for effective representation by defense counsel and that the interests of justice in excluding time outweigh the interests of the defendant and the public in a speedy trial.

SO STIPULATED AND AGREED,

BRIAN J. STRETCH
United States Attorney

/s/

Dated: February 16, 2016

JOHN H. HEMANN
Assistant U.S. Attorney

/s/

Dated: February 16, 2016

THOMAS F. CARLUCCI
Attorney for Jing Zeng

~~[PROPOSED]~~ ORDER

Pursuant to stipulation, IT IS SO ORDERED.

The preliminary hearing or arraignment is continued to March 9, 2016, at 9:30 am. Time is excluded for the reasons stated pursuant to Fed. R. Crim. P. 5.1(d) and 18 U.S.C. § 3161(h)(7).

Dated: February 16, 2016



MARIA ELENA JAMES
United States Magistrate Judge